

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

14125.441

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
425 EAGLE ROCK AVENUE, SUITE 302
ROSELAND, NJ 07068
(973) 618-4100

ATTORNEYS FOR DEFENDANT – NCO Financial Systems, Inc.

KOFI YIRENKYI CIVIL ACTION NO.: 09-cv-00408-KSH-PS

Plaintiff

Civil Action

v.

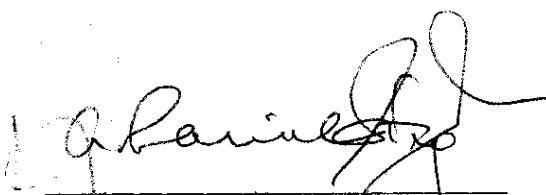
NCO

Defendants

**PROPOSED FORM OF ORDER OF
DISMISSAL OF ALL CLAIMS**

This matter, having been amicably adjusted between the parties, it is hereby stipulated that all claims in the above-captioned matter against NCO Financial Systems, Inc. (improperly plead as NCO), are dismissed with prejudice and without costs, at the request of the plaintiff, Kofi Yirenkyi.

Kofi Yirenkyi
1231 Baker St.
Hillside, NJ 07205


Katherine S. Heydon, U.S.D.J.

Dated: March 10th, 2009
11/852071.v1

Kofi Yirenkyi
1231 Baker St
Hillside NJ 07205

March 6, 2009

MAR 9 2009

Via Certified, RRR#

14125. 441-4

CC: Attn: County Clerk
USPO & Courthouse
Attn: Mark Falk
Federal SQ., Room 457
Newark NJ 07101

HON. Patty Shwartz
United States Magistrate Judge

MDWC&G Attorneys at Law
Attn: Hillary A. Franenkel
425 Eagle Rock Ave Ste 302
Roseland NJ 07068

Re: Kofi Yirenkyi v. NCO
Civil Action No. 09-408(KSH)

Dear Sir/Madame:

I am the plaintiff in the above caption matter, kindly file and stamp Notice of Dismissal. Return stamp copy in self address envelope.

Thanking you in advance.

Kofi Yirenkyi
1231 Baker St.
Hillside NJ 07205

Kofi Yirenkyi	:	UNITED STATES DISTRICT
	:	COURT OF NEW JERSEY
Plaintiff	:	
	:	
	:	ESSEX COUNTY
	:	Civil Action No. 09-408(KSH)
	:	
	:	NOTICE OF DISMISSAL
NCO	:	
Defendant	:	

Plaintiff, *pro se*, Kofi Yirenkyi hereby gives notice to The Court that his claims against NCO, ct al. are dismissed.



Kofi Yirenkyi

DATED: 03/3/2009

425 Eagle Rock Avenue, Suite 302 · Roseland, NJ 07068
(973) 618-4100 · Fax (973) 618-0685 Joseph A. Manning, Resident Managing Attorney

Direct Dial: 973-618-4113
Email: hafraenkel@mdwecg.com

March 9, 2009

VIA ELECTRONIC FILING AND REGULAR MAIL

Hon. Katherine S. Hayden, U.S.D.J.
U.S. District Court
District of New Jersey
Frank R. Lautenberg U. S. P.O. & P.O. Courthouse
P.O. Box 999, Room 311
Newark, New Jersey 07101-0999

RE: Kofi Yirenkyi v. NCO
Docket No.: 09-cv-00408-KSH-PS
Old Docket No.:(New Jersey Union County Docket SC-71-09)
Our File No.: 14125.441-HAF

Dear Judge Hayden:

This office represents the defendant NCO Financial Systems, Inc., improperly named as "NCO", in the above-captioned matter. I received the enclosed correspondence from pro se plaintiff, dated March 6, 2009, along with the Notice of Dismissal, dated March 3, 2009 in this matter. I have prepared a proposed form of Order of Dismissal and am enclosing it with this letter confirming that we consent to pro se plaintiff's dismissal of all claims.

By copy of this letter, we are serving copies of the aforementioned papers upon the pro se plaintiff.

Very truly yours,

/s/ Hillary A. Fraenkel

Enclosures

cc: Kofi Yirenkyi (via regular and certified mail)
Maria N. Rabieh, Esq. (via email and Regular Mail)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
DOCUMENT ELECTRONICALLY FILED

KOFI YIRENKYI)
)
)CIVIL ACTION NO.: 09-cv-00408-KSH-PS
Plaintiff,)
)
v.)
)
NCO)
)
Defendant.)
)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date the letter consenting to plaintiff's request for a dismissal of all claims against the defendant and a proposed form of Order of Dismissal were served via Electronic Filing and regular mail to the United States District Court, District of New Jersey, on behalf of the defendant, on all parties of record as follows:

VIA ECF and REGULAR MAIL:

TO: Hon. Katherine S. Hayden, U.S.D.J.
U.S. District Court
District of New Jersey
Frank R. Lautenberg U. S. P.O. & P.O. Courthouse
P.O. Box 999, Room 311
Newark, New Jersey 07101-0999

VIA CERTIFIED AND REGULAR MAIL:

TO: Kofi Yirenkyi
1231 Baker St.
Hillside, NJ 07205

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: /s/ Hillary A. Fraenkel
Hillary A. Fraenkel, Esq.

Dated: March 9, 2009

11/852072.v1